

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In Re: BP P.L.C. SECURITIES
LITIGATION

) MDL NO. 2185
) Civil Action No. 4:10-md-2185
)

Document relates to:

Whitley v. BP P.L.C., et al.
Case No. 10-cv-04214

Moule v. BP Corp. North America, Inc., et al.,
Case No. 10-cv-04289

Arshadullah and Pierce v. BP P.L.C., et al.
Case No. 10-cv-04294

McGuire v. BP Corp. North America, Inc., et
al.,
Case No. 10-cv-04301

Riely v. BP Corp. North America, Inc., et al.,
Case No. 10-cv-04306

Mineman v. BP Corp. North America, Inc., et
al.,
Case No. 10-cv-04305

Humphries v. BP Corporation, North
America, Inc., et al.
Case No. 10-cv-04300

Soesman v. BP Corp. North America Inc., et
al.,
Case No. 10-cv-04307

DECLARATION OF THOMAS R. AJAMIE IN SUPPORT OF
PLAINTIFFS' MOTION FOR CONSOLIDATION OF
ERISA ACTIONS AND APPOINTMENT OF INTERIM CO-LEAD CLASS COUNSEL

I, Thomas R. Ajamie, declare under penalty of perjury as follows:

1. I am an attorney duly licensed to practice before all of the Courts of the State of

Texas. I am a member of the firm of Ajamie LLP, one of the counsel of record for plaintiff David M. Humphries in *Humphries v. BP Corp. North America, Inc., et al.*, Case No. 1:10-cv-04264, in the United States District Court for the Southern District of Texas, Houston Division. The case is an ERISA action that has been transferred to this Court pursuant to a Conditional Transfer Order entered in MDL No. 2185 on October 29, 2010 by the United States Judicial Panel on Multidistrict Litigation

2. I submit this Declaration in support of the motion by plaintiffs Ralph Whitley and David M. Humphries to consolidate the related ERISA class actions and appoint Interim Co-Lead Class Counsel.

3. I have personal knowledge of the matters stated herein, and if called upon, I could and would competently testify thereto.

4. Attached hereto as Exhibit 1 is a true and correct copy of the Complaint filed on June 24, 2010 in *Whitley v. BP P.L.C., et al.*, Civil Action No. 10-cv-4935, in the United States District Court for the Southern District of New York. The action has been transferred to this Court and is now pending as Case No. 4:10-cv-4214, in the United States District Court for the Southern District of Texas, Houston Division.

5. Attached hereto as Exhibit 2 is a true and correct copy of the Complaint filed on June 28, 2010 in *Moule v. BP Corporation North America, Inc., et al.*, No. 10 C 3990, in the United States District Court for the Northern District of Illinois. The action has been transferred to this Court and is now pending as Case Number 4:10-cv-04289, in the United States District Court for the Southern District of Texas, Houston Division.

6. Attached hereto as Exhibit 3 is a true and correct copy of the Complaint filed on June 29, 2010 in *Arshadullah v. BP P.L.C., et al.*, No. 10-cv-04026 in the United States District

Court for the Northern District of Illinois. The action has been transferred to this Court and is now pending as Case No. 4:10-cv-04294, in the United States District Court for the Southern District of Texas, Houston Division.

7. Attached hereto as Exhibit 4 is a true and correct copy of the Complaint filed on July 13, 2010 in *McGuire v. BP*, No. 10-cv-04337, in the United States District Court for the Northern District of Illinois. The action has been transferred to this Court is now pending as Case No. 10-cv-04301, in the United States District Court for the Southern District of Texas, Houston Division.

8. Attached hereto as Exhibit 5 is a true and correct copy of the Complaint filed on July 16, 2010 in *Riely v. BP Corp. North America Inc., et al.*, No. 10-cv-04448, in the United States District Court for the Northern District of Illinois. The action has been transferred to this Court and is now pending as Case No. 10-cv-04306, in the United States District Court for the Southern District of Texas, Houston Division.

9. Attached hereto as Exhibit 6 is a true and correct copy of the Complaint filed on July 13, 2010 in *Mineman v. BP Corp. North America Inc., et al.*, No. 10-cv-04390 in the Northern District of Illinois. The action has been transferred to this Court and is now pending as Case No. 10-cv-04305, in the United States District Court for the Southern District of Texas, Houston Division.

10. Attached hereto as Exhibit 7 is a true and correct copy of the Complaint filed on July 9, 2010 in *Humphries v. BP Corp. North America Inc., et al.*, No. 10-cv-04264, in the United States District Court for the Northern District of Illinois. The action has been transferred to this Court and is pending as Case No. 1:10-cv-04264, in the United States District Court for the Southern District of Texas, Houston Division.

11. Attached hereto as Exhibit 8 is a true and correct copy of the Complaint filed on August 5, 2010 in *Soesman v. BP Corp. North America Inc., et al.*, No. 10-cv-04940 in the Northern District of Illinois. The action has been transferred to this Court and is now pending as Case No. 10-cv-04307, in the United States District Court for the Southern District of Texas, Houston Division.

12. Attached hereto as Exhibit 9 is a true and correct copy of the Order Denying Transfer in MDL 2189 And Transferring The Subject Actions To MDL 2185, which was entered on October 13, 2010 by the United States Judicial Panel on Multidistrict Litigation.

13. Attached hereto as Exhibit 10 is a true and correct copy of the Conditional Transfer Order (CTO-3) entered on October 29, 2010 by the United States Judicial Panel on Multidistrict Litigation. The order was filed in this District on October 29, 2010.

14. Attached hereto as Exhibit 11 is a true and correct copy of the [Proposed] Order Consolidating ERISA Actions and Appointing Interim Co- Lead Class Counsel.

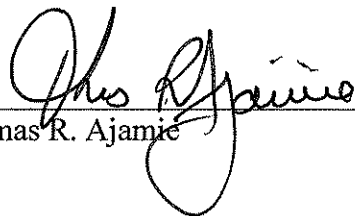
15. Attached hereto as Exhibit 12 is a true and correct copy of the firm resume of Liner Grode Stein Yankelevitz Sunshine Regenstreif & Taylor LLP.

16. Attached hereto as Exhibit 13 is a true and correct copy of the firm resume of Squitieri & Fearon, LLP.

17. Attached hereto as Exhibit 14 is a true and correct copy of the firm resume of Ajamie LLP.

18. I declare under penalty of perjury under the laws of the State of Texas that the foregoing facts are true and correct.

Executed this 3rd day of November, 2010 at Houston, Texas.



Thomas R. Ajamie